

**Part C State Performance Plan (SPP) for 2005-2010****Overview of State Performance Plan Development:**

The Massachusetts Part C State Performance Plan was developed between September and December 2005, incorporating information from prior reporting to OSEP through Annual Performance Reports, as well as public input from over 70 people at a presentation to the full Interagency Coordinating Committee (ICC) and numerous additional stakeholders on November 10, 2005, addressing all required indicators. Prior to the November 10 ICC meeting, a letter from the Part C Coordinator inviting parents, EI Program directors, and EI vendors to that meeting was widely distributed.

Data reported in the SPP is gleaned from numerous sources which follow: They are collated, and interpreted for this report and for ongoing program monitoring. A primary source of data is the Early Intervention Information System (EIIS), a data management system maintained at the Department of Public Health as a Microsoft SQL database. Massachusetts' 62 community-based Early Intervention providers agencies enter data into the EIIS system on a regular basis. Client registration data, including service coordinator assignment and other child-specific data, is entered within 10 days of first face-to-face service date (a new standard in SFY 2005) to create a new client record. Eligibility evaluation and service plan data is entered within 10 days of evaluation. This data is then correlated with a comprehensive service delivery database for data verification, for example, to access dates of service for individual children. Client discharge data is to be entered within 10 days of discharge date.

Seven service types are tracked via Service Delivery by provider discipline and child identification number, including: Home Visit, Center-Based Individual Visit (requires justification for service not in natural environment), Community Child Group, EI-Only Child Group (also requires justification for service not in natural environment), Parent Group, Assessment, and Intake/Screening.

This Plan was developed using data from EIIS and Service Delivery reports, as well as monitoring and complaint system data. Additional data from prior year Annual Performance Reports and the parent complaint data system was incorporated as well. In order to gather baseline data on all required indicators for the SFY 2005 reporting period, the state also utilized a Self-Assessment for EI providers. The self-assessment form gathered affirmations on provider data and process verification, as well as information we will use to verify data submitted, and a transition survey in which the Lead Agency requested information on three questions for every child discharged during the reporting period as potentially LEA eligible. The transition survey data is utilized on our response to Question 8, as is our Data Verification protocol.

In preparation for submission of our 20<sup>th</sup> year application in April 2006, Massachusetts intends to hold a public hearing in January 2006, into which information regarding the State's Part C Performance Plan will be integrated. In addition, the Lead Agency will plan other methods of gathering feedback from the public on the SPP (electronically through publication of web-based data, through focus groups associated with program monitoring, at training venues, etc).

**Monitoring Priority: Early Intervention Services In Natural Environments**

**Indicator 1:** Percent of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner.

(20 USC 1416(a)(3)(A) and 1442)

**Measurement:**

Percent = # of infants and toddlers with IFSPs who receive the early intervention services on their IFSPs in a timely manner divided by the total # of infants and toddlers with IFSPs times 100.

Account for untimely receipt of services.

**Overview of Issue/Description of System or Process:**

Input was sought from ICC members and approximately 40 other stakeholders on November 10, 2005, regarding the state's definition of "timely".

While there is currently no set standard for number of days between IFSP meeting and IFSP signature date, many stakeholders and Lead Agency staff are concerned about adopting the standard of 30 days, meaning that potentially a minimum of 75 days could pass between a family's initial referral and first IFSP service date. For this reason, the following recommendation was made:

- The state's definition of "timely", currently operationalized at 21 days, will move to 30 days in the new revision of the Massachusetts Early Intervention Operational standards (MA EIOS), to be completed in January 2006. The Lead Agency's intention is to establish a "tickler" system that will inform providers when this period exceeds 21 days, thereby allowing the 30 day standard to be met consistently.

The public input session also raised the question of compliance with timely services when the family is unable to be available, for example when a child is hospitalized. It was also noted that because Massachusetts serves an at-risk population, this could potentially result in a higher rate of family cancellation or "no-shows" due to the many issues with which families may be dealing. Lead Agency staff explained that OSEP is seeking this data in order to determine whether reasons for lateness are systemic or family reasons. "Reason codes" in our information system assist the Lead Agency in determining the reasons for lateness of service start date.

The following wording was discussed and agreed upon by Part C staff for incorporation into the EI Operational Standards:

**The Massachusetts Early Intervention system defines "timely services" as those that begin within, and do not exceed, 30 days of the IFSP signature date. Programs are encouraged to make good faith efforts to begin services immediately following the day of the IFSP signature. Services designated by the IFSP team as "weekly" should begin within one week, and services designated as "monthly" should begin within one month.**

One of two priority areas for our state's Focused Monitoring system, which will replace our previous monitoring system beginning January 2006, is "Service Coordination". The indicator selected for ranking programs in this area is: "Number of days between IFSP signature date and first service date". Data relating to "Number of days between IFSP signature date and first service date" was presented to stakeholders at the State Interagency Coordinating Council meeting November 10, 2005. The report developed for Focused Monitoring purposes includes this information by individual program and includes program ranks. This data report was shared with providers statewide November 18, 2005 via e-mail and regular mail and will be reviewed at a statewide program directors' training December 5, 2005, at which directors will be given information on the focused monitoring process, protocols, and procedures.

Massachusetts ensures that all children receive all services on their IFSP's through a monitoring system that includes the following components:

- Annual Self-Assessment (new format developed for the first time to report on SFY 2005 data) completed by providers, which requires affirmation that referral, eligibility evaluation, and IFSP timelines are followed and accurately reported to EIIS. The Self-Assessment includes a Data Verification component that matches information reported by providers to service delivery and information systems to ensure accuracy.
- Monitoring of EIIS data, and reporting by region to Regional Specialists, every six months by Data Manager.
- On site visits to one program for each of two areas in each of five groupings (a total of ten visits: programs are grouped by size of enrollment) each year. On site monitoring is done by a team of Lead Agency staff and parents, and includes a desk audit, data review, record review and focus groups with parents, staff and community members in order to explore the reasons for untimely services.
- Tracking of parent complaint data, which is then correlated with EIIS data to target programs in need of improvement.

**Baseline Data for FFY 2004 (2004-2005):**

The following data was shared with ICC members and other stakeholders in November 2005 in order to solicit input:

- ♦ Data from January 2005 to July 2005 indicates a range of 8 days to 35 days from IFSP signature date to first service for all providers. The statewide average is 14 days, and most providers fall well within 30 days.
- ♦ Between January 2005 and June 2005, 6,302 children had new IFSPs. 5,023 (79.7%) of those children had their first service within 21 days; 5,587 (88.6%) of those children had first service within 30 days.

- ♦ Of 9,930 children with new and existing IFSP's during the same period (January 2005-July 2005), 8,208 (82.7 %) had their first service within 21 days, and 8,941 (90%) within 30 days.

**Discussion of Baseline Data:**

Reason codes are currently collected on the EIIS for the time period from referral to IFSP meeting (see Indicator # 7) and indicate that a variety of reasons, ranging from child hospitalization to lack of program personnel, are invoked to explain IFSP meetings that are not held within the 45 day timeline. The Lead Agency extrapolates that these reason codes also account for untimely receipt of services. Our system clarified the definitions of all reason codes over the past year, so the system can determine whether the program remains in compliance (for example, the family cancelled or moved, the child was hospitalized) or out of compliance (for example, staff became ill, personnel of the needed discipline were not available).

As we update EIIS for SFY 2007, we will develop a mechanism to gather reason codes for timeliness regarding receipt of services.

<b>FFY</b>	<b>Measurable and Rigorous Target</b>
<b>2005</b> (2005-2006)	<b>100% of infants and toddlers with IFSPs receive the early intervention services on their IFSPs in a timely manner according to the state's definition of "timely".</b>
<b>2006</b> (2006-2007)	<b>100% of infants and toddlers with IFSPs receive the early intervention services on their IFSPs in a timely manner according to the state's definition of "timely".</b>
<b>2007</b> (2007-2008)	<b>100% of infants and toddlers with IFSPs receive the early intervention services on their IFSPs in a timely manner according to the state's definition of "timely".</b>
<b>2008</b> (2008-2009)	<b>100% of infants and toddlers with IFSPs receive the early intervention services on their IFSPs in a timely manner according to the state's definition of "timely".</b>
<b>2009</b> (2009-2010)	<b>100% of infants and toddlers with IFSPs receive the early intervention services on their IFSPs in a timely manner according to the state's definition of "timely".</b>
<b>2010</b> (2010-2011)	<b>100% of infants and toddlers with IFSPs receive the early intervention services on their IFSPs in a timely manner according to the state's definition of "timely".</b>

**Improvement Activities/Timelines/Resources:**

Our state has re-configured our entire monitoring system to better meet General Supervision requirements. We are targeting regional resources to programs most in need of improvement, and are also improving data collection, verification, and monitoring protocols to allow us to more closely and frequently monitor using key data elements.

Massachusetts has updated our monitoring system over the past two years. Working closely with the National Center for Special Education Accountability and Monitoring (NCSEAM), our state is implementing a “Focused Monitoring” system to determine how sites will be selected for visits based on data and rankings, rather than automatically visiting each program every year.

As discussed above, we are developing a “tickler” system for notifying programs when time between IFSP signature and services exceeds 21 days, to assist programs in self-monitoring. Programs whose data review reveals that services are untimely will be required to submit a corrective action plan to their region’s Regional Specialist and will be monitored to determine that they are able to comply with the requirement.

In addition, in SFY 2007 we will be instituting a new set of “reason codes” to explain instances of untimely services.

Detailed information, support, and technical assistance will be offered to all Early Intervention Program directors by Lead Agency staff and Regional Specialists to support providers in both understanding the requirements and in meeting this goal.

Implementation of the state’s newly adopted definition of “timely” will be incorporated into the Massachusetts Early Intervention Operational Standards (MA EIOS), currently under revision for a January 2006 completion date. The definition will also be widely distributed, along with technical assistance in meeting this requirement, at a Program directors’ training to be held December 5, 2005.

**Part C State Performance Plan (SPP) for 2005-2010****Overview of State Performance Plan Development:**

When Indicator 2, “*infants and toddlers with IFSPs primarily receive early intervention services in the home or programs for typically developing children*”, was discussed at a public input session on November 10, 2005, the following points were raised by stakeholders:

- Our state has made significant progress in addressing, defining and complying with this area.
- 618 data does not provide a complete picture because it only describes where children receive MOST of their services
- It continues to be appropriate for some children (those who are medically fragile, blind or deafblind) to receive services in settings that are not natural environments, such as clinic settings or Schools for the Blind or Deaf, WITH appropriate justification.

*(The following items are to be completed for each monitoring priority/indicator.)*

<b>Monitoring Priority: Early Intervention Services In Natural Environments</b>
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**Indicator 2:** Percent of infants and toddlers with IFSPs who primarily receive early intervention services in the home or programs for typically developing children.

<b>Measurement:</b>
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Percent = # of infants and toddlers with IFSPs who primarily receive early intervention services in the home or programs for typically developing children divided by the total # of infants and toddlers with IFSPs times 100.
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**Overview of Issue/Description of System or Process:**

Previous non-compliance in this area has been addressed and corrected through monitoring, updated reporting mechanisms, and training for providers regarding service setting and appropriate justification. Non-compliance was identified by OSEP in reviewing 618 “settings” data and was included as part of the State Improvement Plan in 2000.

One method the Lead Agency utilized in order to address this issue was to assist EI providers build capacity for community relationships by providing support for EI providers in reaching out to community-based programs. This was done through mini-grants in 2000 and 2001 to specifically support the time needed to build relationships within communities that would result in shared, community-based activities for young children such as community playgroups. Following these grants, the Lead Agency developed a very specific and concrete definition of a “community group” in 2002 that could include both early intervention and typically developing children and could be provided at an early intervention program site. The Lead Agency also developed a rate differential so community groups were reimbursed at a higher rate than EI-only groups. The Universal IFSP form was updated to include the requirement that a justification must be included for all services not provided in a natural

setting. On site monitoring practices were updated to allow the Lead Agency to correlate IFSP's reviewed, progress notes, and service delivery reports, verifying this data against what was entered in the EIIS system.

The Lead Agency, in partnership with MA Department of Education, also applied for and received a General Supervision Enhancement Grant (GSEG) in 2003 to support "Project Playgroup", grants provided to twenty collaborations of community-based EI programs with Massachusetts Family Networks, DOE-supported family support programs for children birth to four. These collaborations resulted in enhancing some existing playgroups and in building new ones in some communities. Massachusetts also worked with the National Early Childhood Technical Assistance Center (NECTAC) to initiate a workplan on providing services in natural environments, throughout 2002 and 2003.

Training offered through the Lead Agency's training vendor was updated to reflect a state commitment to the provision of services in natural environments. Collaboration with the state child care agency, including co-funding (in 2001 and 2002) of Regional Consultation Program (RCP's), who are charged with outreach to Child Care Resource and Referral Agencies to support the inclusion of young children with disabilities in typical child care settings, also resulted in the development of supports for children with disabilities and delays to be better included in settings where typically developing children spend time.

#### **Baseline Data for FFY 2004 (2004-2005):**

Most recent 618 data demonstrates, for primary service setting, **99.2%** (of 13,757 children in 12/1/2004 child count) of children with IFSP's received their primary services in natural settings.

#### **Discussion of Baseline Data:**

The Lead Agency continues to monitor service settings data through the EIIS and through service delivery reports. Our monitoring practices combine all data sources related to setting in order to conclude that practice has indeed changed in our state.

<b>FFY</b>	<b>Measurable and Rigorous Target</b>
<b>2005</b> (2005-2006)	99.3% of children with IFSP's will receive services in the home or in programs for typically developing children, or will have justification statements on their IFSP's as to why such services cannot be delivered in these settings.
<b>2006</b> (2006-2007)	99.4% of children with IFSP's will receive services in the home or in programs for typically developing children, or will have justification statements on their IFSP's as to why such services cannot be delivered in these settings.
<b>2007</b> (2007-2008)	99.5% of children with IFSP's will receive services in the home or in programs for typically developing children, or will have justification statements on their

	IFSP's as to why such services cannot be delivered in these settings.
<b>2008</b> (2008-2009)	99.6% of children with IFSP's will receive services in the home or in programs for typically developing children, or will have justification statements on their IFSP's as to why such services cannot be delivered in these settings.
<b>2009</b> (2009-2010)	99.7% of children with IFSP's will receive services in the home or in programs for typically developing children, or will have justification statements on their IFSP's as to why such services cannot be delivered in these settings.
<b>2010</b> (2010-2011)	99.8% of children with IFSP's will receive services in the home or in programs for typically developing children, or will have justification statements on their IFSP's as to why such services cannot be delivered in these settings.

**Improvement Activities/Timelines/Resources:**

The Lead Agency will continue to mandate training for all new staff in the field regarding the requirements to provide services in natural environments or have justification statements on IFSP's if such services cannot be provided in natural environments. Massachusetts' Universal IFSP Form, utilized by all Massachusetts programs, will continue to specify where and when justification is required. EIIS, Service Delivery, and 618 data will be monitored for service settings by Regional Specialists and the Data Manager.

For SFY 2007, as part of a scheduled update of the EIIS system, a question regarding primary service setting will be added to the IFSP form of the EIIS. This will provide verification of data in ensuring the accuracy of 618 data.

SFY 2006: Annual training for Program Directors will include content on the importance of providing services in natural environments. Programs identified as outliers in this area through data review will receive technical assistance and will be required to submit corrective action plans.

SFY 2007 and ongoing: New question regarding primary service setting to be incorporated into EIIS. A process to provide more detailed reporting of community group settings will be planned and implemented.



**Part C State Performance Plan (SPP) for 2005-2010****Overview of the State Performance Plan Development:**

A spirited discussion of Indicator 3, *infants and toddlers with IFSPs demonstrate improved results*, was held at the November 10 public input session. Among the points raised for OSEP's and the Lead Agency's consideration were the following:

- Criteria for children on the autism spectrum: should separate criteria be developed?
- "Pulling apart" children by areas of development runs counter to the need to measure functional skills and abilities. Therefore, the wording for the requirement on this indicator and the data required to be submitted appear to contradict each other.
- In a system that serves as many children as the Massachusetts system does, in light of the fact that sampling, while allowed, is discouraged, how could functional abilities be collected, short of reviewing 30,000 individual IFSPs?

Massachusetts collects entry and exit data on every child through the EIIS. In past Annual Performance Reports, we have submitted information from eligibility assessments, indicating whether children demonstrated skills at a level of "same", "better", or "worse", and OSEP has appreciated the submission of such specific data. Our State Eligibility Plan of 2003 integrated recommendations from an Eligibility Tools Task Force of the Interagency Coordinating Council as to which curriculum and norm-referenced tools would be used in Massachusetts, both to establish eligibility and to facilitate IFSP and service planning for children. The SFY 2003 and SFY 2004 APR's provide detailed background information on the process that led to our selection of the Michigan EIDP and Battelle Developmental Inventory-2 as the two required tools in our state.

SFY 2005 was the transitional year in this plan, meaning that only one tool was used to determine developmental level for each child in the state: the Michigan Early Intervention Developmental Profile (EIDP). The information below is therefore significant for the following reasons:

- This is potentially the only year for which we would have information derived from only one tool (It is the Lead Agency's intention moving forward to allow use of a wider variety of tools to determine developmental level).
- As was pointed out in our public input session in November, final evaluation scores can be as much as 11 months off from the child's actual date of exit/discharge.
- Massachusetts stakeholders also expressed concern about the domain-specific nature of the request, articulating that many of them are not in favor of "pulling children apart" to get this information.
- These same stakeholders are committed to and applaud OSEP's intention of gathering skill progression as functional outcomes, however, short of file review of individual IFSP's there is no way to accurately gather children's progression in functional outcomes. Performing file reviews of 30,000 children in the Massachusetts system is not a practical alternative for our staff. We therefore submit the information below with the caveats articulated above.

- In future years, we propose to use the crosswalk developed by the ECO Center for the Battelle Developmental Inventory-2. The BDI-2 is the second tool approved for use in eligibility evaluation in Massachusetts. Many programs have begun to use it in SFY 2006 (as of July 1, 2005). The crosswalk allows clear and consistent reporting on children for whom the BDI-2 was used to determine developmental level at entry and exit.

*(The following items are to be completed for each monitoring priority/indicator.)*

**Monitoring Priority: Early Intervention Services In Natural Environments**

**Indicator 3:** Percent of infants and toddlers with IFSPs who demonstrate improved:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/ communication); and
- C. Use of appropriate behaviors to meet their needs.

(20 USC 1416(a)(3)(A) and 1442)

**Measurement:**

A. Positive social-emotional skills (including social relationships):

- a. Percent of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers = # of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers divided by # of infants and toddlers with IFSPs assessed times 100.
- b. Percent of infants and toddlers who improve functioning = # of infants and toddlers who improved functioning divided by # of infants and toddlers with IFSPs assessed times 100.
- c. Percent of infants and toddlers who did not improve functioning = # of infants and toddlers who did not improve functioning divided by # of infants and toddlers with IFSPs assessed times 100.

If children meet the criteria for a, report them in a. Do not include children reported in a in b or c. If a + b + c does not sum to 100%, explain the difference.

B. Acquisition and use of knowledge and skills (including early language/communication):

- a. Percent of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers = # of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers divided by # of infants and toddlers with IFSPs assessed times 100.
- b. Percent of infants and toddlers who improved functioning = # of infants and toddlers who improved functioning divided by # of infants and toddlers with IFSPs assessed times 100.
- c. Percent of infants and toddlers who did not improve functioning = # of infants and toddlers who did not improve functioning divided by # of infants and toddlers with IFSPs assessed times 100.

If children meet the criteria for a, report them in a. Do not include children reported in a in b or c. If a + b + c does not sum to 100%, explain the difference.

## C. Use of appropriate behaviors to meet their needs:

- a. Percent of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers = # of infants and toddlers who reach or maintain functioning at a level comparable to same-aged peers divided by # of infants and toddlers with IFSPs assessed times 100.
- b. Percent of infants and toddlers who improved functioning = # of infants and toddlers who improved functioning divided by # of infants and toddlers with IFSPs assessed times 100.
- c. Percent of infants and toddlers who did not improve functioning = # of infants and toddlers who did not improve functioning divided by # of infants and toddlers with IFSPs assessed times 100.

If children meet the criteria for a, report them in a. Do not include children reported in a in b or c. If a + b + c does not sum to 100%, explain the difference.

**Overview of Issue/Description of System or Process:**

Massachusetts' 3-year eligibility tool determination plan designated a process for utilizing assessment tools recommended by an Eligibility Tools Task Force of the State ICC in 2001. For State FY 2005, the plan required that one tool (the Michigan Early Intervention Developmental Profile) be used to establish eligibility and to plan for service delivery for all children, although use of supplemental tools to gather additional information and establish eligibility via clinical judgment are encouraged.

For State FY 2006, programs were offered the option to add use of the Battelle Developmental Inventory-2 (BDI-2) as an alternative tool to establish eligibility. All providers had access to training offered through the Lead Agency in the use, administration, and scoring of the BDI-2, and some providers began to use it for eligibility in July 2005.

**Baseline Data for FFY 2004 (2004-2005):**

	Social/Emotional		Communication		Adaptive	
	# Kids	% Kids	# Kids	% Kids	# Kids	% Kids
<b>a. Age appropriate</b>	1,903	17.6%	1,196	10.4%	1,359	12.3%
<b>b. Improved</b>	5,024	46.5%	7,831	68.1%	5,794	52.4%
<b>c. No improvement</b>	3,866	35.8%	2,475	21.5%	3,901	35.3%
<b>Totals</b>	<b>10,793</b>	<b>100.0%</b>	<b>11,502</b>	<b>100.0%</b>	<b>11,054</b>	<b>100.0%</b>
<b>Missing*</b>	<b>3,896</b>		<b>3,187</b>		<b>3,635</b>	
<b>Grand Totals</b>	<b>14,689</b>		<b>14,689</b>		<b>14,689</b>	

\* "Missing" data includes a small number (fewer than 1%) of children for whom birth dates were missing and children for whom the earliest evaluation was the same as the most recent evaluation.

**Discussion of Baseline Data:**

Baseline data is based on one tool (the Michigan EIDP was the only assessment instrument universally administered to all children). Previous data reported in the APR was only reported on children eligible by virtue of developmental delay. However, our new eligibility plan allows us to report on every child.

Data reported above includes all children with IFSP's who were discharged in SFY 2005. Developmental domains on the earliest evaluation were compared with those on the most recent evaluation. "Missing" data includes a small number (fewer than 1%) of children for whom birth dates were missing and children for whom the earliest evaluation was the same as the most recent evaluation. Children were reported as "age appropriate" if their chronological age and developmental age score coincided.

<b>FFY</b>	<b>Measurable and Rigorous Target</b>
<b>2005</b> (2005-2006)	48% of EI children will show improvement in the Social-Emotional domain; 70% in Adaptive, and 55% in Communication.
<b>2006</b> (2006-2007)	49% of EI children will show improvement in the Social-Emotional domain; 72% in Adaptive, and 57% in Communication.
<b>2007</b> (2007-2008)	50% of EI children will show improvement in the Social-Emotional domain; 73% in Adaptive, and 58% in Communication.
<b>2008</b> (2008-2009)	51% of EI children will show improvement in the Social-Emotional domain; 74% in Adaptive, and 59% in Communication.
<b>2009</b> (2009-2010)	52% of EI children will show improvement in the Social-Emotional domain; 75% in Adaptive, and 60% in Communication.
<b>2010</b> (2010-2011)	53% of EI children will show improvement in the Social-Emotional domain; 76% in Adaptive, and 63% in Communication.

**Improvement Activities/Timelines/Resources:**

Our state will not use sampling to address this indicator, because we have current capacity through the EIIS to report on all children. Our plan for collecting and submitting data in this area is as follows:

1. If data submitted as above, comparing scores close to entry and close to exit, which, after July 1, 2005 will be based on one of two tools administered for every child, is acceptable to OSEP, we will continue to report as above. We are aware that this means we are reporting on developmental skills, which do not always correlate directly with functional skills, as defined by OSEP.
2. For those children who have been assessed using the BDI-2, we will use the ECO Center's crosswalk.
3. We will explore the use of the ECO Center's Summary Tool as a supplemental tool to be utilized during the assessment process for all children in Massachusetts. However, unless the ECO Center has developed straightforward methods for collecting and synthesizing information from this tool, we are unlikely to use it due to lack of resources for additional data collection.
4. As we implement the NCSEAM Family Survey within our state, we will explore the possibility of adding questions regarding child outcomes for parent response.

In addition to the above planned activities, the Lead Agency has submitted an application for a General Supervision Enhancement Grant related to developing child outcomes that will address OSEP's questions in concert with the 619 program, housed at Department of Early Education and Care, and the Part B program, housed at Department of Education. Whether or not this support is received, plans are afoot to improve linkage and communication across agencies within the data systems with particular regard to child outcomes.

**Part C State Performance Plan (SPP) for 2005-2010****Overview of the State Performance Plan Development:***(The following items are to be completed for each monitoring priority/indicator.)***Monitoring Priority: Early Intervention Services In Natural Environments****Indicator 4:** Percent of families participating in Part C who report that early intervention services have helped the family:

- A. Know their rights;
- B. Effectively communicate their children's needs; and
- C. Help their children develop and learn.

(20 USC 1416(a)(3)(A) and 1442)

**Measurement:**

- A. Percent = # of respondent families participating in Part C who report that early intervention services have helped the family know their rights divided by the # of respondent families participating in Part C times 100.
- B. Percent = # of respondent families participating in Part C who report that early intervention services have helped the family effectively communicate their children's needs divided by the # of respondent families participating in Part C times 100.
- C. Percent = # of respondent families participating in Part C who report that early intervention services have helped the family help their children develop and learn divided by the # of respondent families participating in Part C times 100.

**Overview of Issue/Description of System or Process:**

In State FY 2005, the Lead Agency participated with NCSEAM in the Family Survey pilot, administering close to 500 surveys to EI families over the course of approximately two months to collect data. As participants in this pilot, Massachusetts families responded to lengthy surveys in order to assist NCSEAM in establishing the validity of certain questions regarding family-centered services. Massachusetts completed the highest number of surveys of any state collaborating with NCSEAM in the Part C pilot. The Lead Agency intends to build on this experience and relationship to utilize the NCSEAM Family Survey, establishing baseline data to be submitted in the February 2007 APR.

The Lead Agency's Director of Family Initiatives, Suzanne Gottlieb, and the Parent Leadership Project (an Early Intervention parent involvement project funded with Part C dollars) will be taking the lead in an implementation plan for the NCSEAM Family Survey. Ms. Gottlieb is currently working with Dr. Lisa Persinger of NCSEAM to answer questions and establish the parameters. In addition, the Lead Agency will be seeking consultation from NCSEAM's Dr. Batya Elbaum and other experts in the establishment of a sampling plan for this indicator on an as needed basis.

Family Survey results will be tabulated and posted on the DPH website annually, or twice a year if possible, and will also be sent out to each program director.

The public input session in November yielded input regarding the NCSEAM Family Survey. Most participants were comfortable with the survey as formulated but a question was raised about the 6-point answer scale, fearing that there were too many gradations for families to feel comfortable with in completing the survey. Other participants raised points regarding relevance: parts of the NCSEAM survey are less relevant to the Massachusetts system than other parts. At least one participant mentioned that individual provider agencies collect annual consumer satisfaction surveys, and requested that the Lead Agency not initiate the Family Survey at the same time of year that other consumers surveys are being collect, in order not to overwhelm or confuse families.

It is the Lead Agency's intention to continue to solicit public input, particularly input from family members, as we more fully develop our plan for collaboration with NCSEAM in the administration of the survey. A major question that we must answer as part of planning has to do with resources on the part of the Lead Agency: during the Family Survey pilot, Massachusetts' Parent Leadership Project and Family TIES staff actively recruited families and assisted them in completing the survey.

Participants at the public input session commended both NCSEAM and the Massachusetts Lead Agency for their commitment to use of a tool that collects family information and has high reliability and validity.

**Baseline Data for FFY 2004 (2004-2005):****New Indicator: Data to be submitted in APR February 1, 2007.**

## Part C State Performance Plan (SPP) for 2005-2010

## Overview of the State Performance Plan Development:

*(The following items are to be completed for each monitoring priority/indicator.)***Monitoring Priority: Effective General Supervision Part C / Child Find****Indicator 5:** Percent of infants and toddlers birth to 1 with IFSPs compared to:

- A. Other States with similar eligibility definitions; and
- B. National data.

(20 USC 1416(a)(3)(B) and 1442)

**Measurement:**

- A. Percent = # of infants and toddlers birth to 1 with IFSPs divided by the population of infants and toddlers birth to 1 times 100 compared to the same percent calculated for other States with similar (narrow, moderate or broad) eligibility definitions.
- B. Percent = # of infants and toddlers birth to 1 with IFSPs divided by the population of infants and toddlers birth to 1 times 100 compared to National data.

**Overview of Issue/Description of System or Process:**

Based on 12/1/2004 child count data, 2,210 (2.76%) of infants and toddlers under the age of one have an IFSP.

Discussion at November's public input session took note of the fact that Massachusetts serves one of the highest percentages (first or second in numbers served dependent upon inclusion of at-risk of delay) of both children birth to one and birth to three in Part C. The challenge in recent years has been to manage the system's growth within available resources. This was done successfully in SFY 2005. SFY 2005 was also the first year of flat growth since the program's entry into the federal Part C system in 1988.

**Baseline Data for FFY 2004 (2004-2005):**

**Comparative Data between National Baseline and Massachusetts for infants served under the age of one, including children at risk of delay**

National Baseline (12/1/04)	Massachusetts (12/1/04)
0.98%	2.76%



Comparative Data for States with **Similar Eligibility** for infants served under the age of one, including children at risk of delay

State	% Served under 1 year of age	Difference from National Average
Hawaii	6.86%	5.88%
<b>Massachusetts</b>	<b>2.76%</b>	<b>1.78%</b>
Indiana	1.99%	1.01%
New Mexico	1.98%	1.00%
West Virginia	1.91%	.93%

#### Discussion of Baseline Data:

Over the past several years the percentage of increase in this category has been steady (approximately .1%) but flattened in the 2004 child count. The implications of this flat growth may be interpreted in a variety of ways. First, it is possible the large majority of infants eligible for early intervention services have been identified and substantial growth may no longer occur within the Massachusetts system. Another interpretation is that infants whose families are easier to engage have come forward and remaining growth in the birth to age one group will be in harder to engage populations (recent immigrants, linguistic minorities). These populations will be challenging to engage and will likely require greater representation of care providers reflecting their cultural and linguistic heritage. Recruitment of personnel that reflect the demographics of the state's early intervention families continues to be a priority of the Massachusetts Early Intervention system.

FFY	Measurable and Rigorous Target
<b>2005</b> (2005-2006)	<b>2.8%</b> - infants served under the age of one, including children at risk of delay
<b>2006</b> (2006-2007)	<b>2.85%</b> - infants served under the age of one, including children at risk of delay
<b>2007</b> (2007-2008)	<b>2.9%</b> - infants served under the age of one, including children at risk of delay
<b>2008</b> (2008-2009)	<b>2.95%</b> - infants served under the age of one, including children at risk of delay
<b>2009</b> (2009-2010)	<b>3.0%</b> - infants served under the age of one, including children at risk of delay

<b>2010</b> (2010-2011)	<b>3.05%</b> - infants served under the age of one, including children at risk of delay
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**Improvement Activities/Timelines/Resources:**

The primary focus of improvement will be continuing to seek out infants eligible for Massachusetts early intervention services. A major effort is currently underway utilizing data from the Massachusetts Perinatal to Early Life Longitudinal (PELL) data project, which is a joint activity of the Massachusetts Department of Public Health and the Boston University School of Public Health. The project involves collecting and comparing data from the Early Intervention Information System, Massachusetts birth certificate data and Massachusetts birth hospital discharge information. What is emerging from initial analysis is the apparent existence of disparities in referral practices for women and infants with low English proficiency or women are foreign born. DPH staff are currently in discussion of how to utilize this information for program improvement activities and incorporation into key indicators in SFY-06 and SFY-07.

In regard to program growth, securing adequate financial resources to support projected growth will remain key. Appropriate levels of funding are in place for SFY-06 and the state budget for SFY-07 is currently in process. At present, it is expected that adequate resources will be available to serve all identified infants in SFY-07.

## Part C State Performance Plan (SPP) for 2005-2010

## Overview of the State Performance Plan Development:

*(The following items are to be completed for each monitoring priority/indicator.)***Monitoring Priority: Effective General Supervision Part C / Child Find****Indicator 6:** Percent of infants and toddlers birth to 3 with IFSPs compared to:

- A. Other States with similar eligibility definitions; and
- B. National data.

(20 USC 1416(a)(3)(B) and 1442)

**Measurement:**

- A. Percent = # of infants and toddlers birth to 3 with IFSPs divided by the population of infants and toddlers birth to 3 times 100 compared to the same percent calculated for other States with similar (narrow, moderate or broad) eligibility definitions.
- B. Percent = # of infants and toddlers birth to 3 with IFSPs divided by the population of infants and toddlers birth to 3 times 100 compared to National data.

**Overview of Issue/Description of System or Process:****Baseline Data for FFY 2004 (2004-2005):**

Based on 12/1/2004 child count data, 13,757 (5.75%) of infants and toddlers under the age of three have an IFSP.

Discussion at November's public input session took note of the fact that Massachusetts serves one of the highest percentage (first or second in numbers served dependent upon inclusion of at-risk of delay) of both children birth to one and birth to three in Part C of any state. The challenge in recent years has been to manage the system's growth within available resources. This was done successfully in SFY 2005. SFY 2005 was also the first year of flat growth since the program's entry into the federal Part C system in 1988.

**Baseline Data for FFY 2004 (2004-2005):****Comparative Data between National Baseline and Massachusetts for infants/toddlers served under the age of three, including children at risk of delay**

National Baseline (12/1/04)	Massachusetts (12/1/04)
2.30%	5.75%

Comparative Data for States with **Similar Eligibility** for infants/toddlers served under the age of three, including children at risk of delay

State	% Served under 3 year of age	Difference from National Average
Hawaii	7.09%	4.79%
<b>Massachusetts</b>	<b>5.75%</b>	<b>3.45%</b>
Wyoming	3.98%	1.68%
New Mexico	3.42%	1.12%
West Virginia	3.26%	0.96%

### Discussion of Baseline Data:

Similar to the baseline data on children under one discussed above, the past several years have seen a small but steady percentage increase in this category (approximately .2 to 4% range) but these increases flattened in the 12/1/04 child count. As with the infant data, the implications of this flat growth may be interpreted in a variety of ways. First, DPH staff believes that the large majority of eligible infants and toddlers in Massachusetts have been identified and that system growth such as that of the 1990's and early 2000's will no longer occur. Assuming that most eligible families have been identified the remaining growth in the Early Intervention program will come from harder to engage populations (recent immigrants, linguistic minorities). As noted previously, these populations will be challenging to engage and will likely require greater representation of care providers reflecting their cultural and linguistic heritage. An additional area which will likely produce modest growth are children identified through the state's child welfare department, in this case the Massachusetts Department of Social Services. It is projected over the next several years that an additional 1,000 to 1,500 children will be referred to the Early Intervention system from the state child welfare agency. This growth has already been projected into state budgetary requests. However, it should be noted that due to Massachusetts' historic broad eligibility, most children identified by the Commonwealth's child welfare agency have been referred and enrolled in large numbers for many years.

FFY	Measurable and Rigorous Target
<b>2005</b> (2005-2006)	<b>5.80% of MA infants and toddlers under age three based upon 12/1/05 count</b>
<b>2006</b> (2006-2007)	<b>5.85% of MA infants and toddlers under age three based upon 12/1/06 count</b>
<b>2007</b> (2007-2008)	<b>5.90% of MA infants and toddlers under age three based upon 12/1/07 count</b>

<b>2008</b> (2008-2009)	<b>5.95% of MA infants and toddlers under age three based upon 12/1/08 count</b>
<b>2009</b> (2009-2010)	<b>6.00% of MA infants and toddlers under age three based upon 12/1/09 count</b>
<b>2010</b> (2010-2011)	<b>6.05% of MA infants and toddlers under age three based upon 12/1/10 count</b>

**Improvement Activities/Timelines/Resources:**

The primary focus of improvement will be to continuing to seek out infants eligible for the Massachusetts early intervention services. A major effort is currently underway utilizing data as previously discussed from the PELL project. What is emerging from initial analysis is disparities in referral practices for women and infants with low English proficiency or women are foreign born. For example, children of foreign born and non-English speaking mothers were 25% less likely to be referred to EI than children of US born and English speaking mothers (PELL-EI data brief-draft-October 2005). Also identified within the PELL data was the fact that of teen mothers found eligible, only one-half were likely to enroll their children for on-going services. DPH staff are currently in discussion of how utilize this information for program improvement activities and incorporation into key indicators during SFY-06 and SFY-07.

It should also be noted that beyond the number/percentages of children receiving on-going early intervention services, an additional 8,000 children receive some type of early intervention service (intake visit, assessment w/ineligible finding or assessment w/eligible finding but choosing not to go forward with the development of an IFSP). These numbers support the Lead Agency's belief that referral to Early Intervention has largely become institutionalized within Massachusetts, most specifically with the Commonwealth's medical community.

In regard to program growth, securing adequate financial resources to support projected growth will remain key. Appropriate levels of funding are in place for SFY-06 and the budget for SFY-07 is currently in process. At present, it is expected that adequate resources will be available to serve all identified infants in SFY-07.

SFY 2006: Continuing efforts to identify more difficult to engage populations and to recruit more diverse personnel to EI staff positions will continue.

SFY 2007: State level three-year initiative to substantially increase direct service providers' salaries to be introduced in budget planning for FY 2007. Continuing efforts to identify more difficult to engage populations and to recruit more diverse personnel to EI staff positions will continue.

SFY 2008: State level three-year initiative to substantially increase direct service providers' salaries to enter second year. Continuing efforts to identify more difficult to engage populations and to recruit more diverse personnel to EI staff positions will continue.

SFY 2009: State level three-year initiative to substantially increase direct service providers' salaries to enter third year. Continuing efforts to identify more difficult to engage populations and to recruit more diverse personnel to EI staff positions will continue. Evaluate SFY 2007 and SFY 2008 activities and correct outreach efforts as appropriate.

**Part C State Performance Plan (SPP) for 2005-2010****Overview of the State Performance Plan Development:**

*(The following items are to be completed for each monitoring priority/indicator.)*

<b>Monitoring Priority: Effective General Supervision Part C / Child Find</b>
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**Indicator 7:** Percent of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting were conducted within Part C's 45-day timeline.

(20 USC 1416(a)(3)(B) and 1442)

<b>Measurement:</b>
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Percent = # of eligible infants and toddlers with IFSPs for whom an evaluation and assessment and an initial IFSP meeting was conducted within Part C's 45-day timeline divided by # of eligible infants and toddlers evaluated and assessed times 100.
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Account for untimely evaluations.
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**Overview of Issue/Description of System or Process:**

The 45-day timeline continues to be monitored as part of our Contract Performance Standards. Lead Agency staff in SFY 2004 updated the definition of "45 days" (replacing "from initial referral to IFSP signature" with "from initial referral to IFSP meeting") in our Operational Standards, and provided training and technical assistance statewide to address this. The curriculum for mandatory training has been updated to reflect the IDEA and State requirement to hold an IFSP meeting within 45 days of referral.

**Baseline Data for FFY 2004 (2004-2005):**

In SFY 2005, 93.2% of children had an evaluation, assessment and initial IFSP meeting conducted within 45 days of referral. This is up from the SFY 2004 rate reported in the previous year's APR of 87%.

**Discussion of Baseline Data:**

This is a high-profile area of attention within our state system. The jump in compliance from SFY 2004 to SFY 2005 reflects the emphasis that the Lead Agency has placed on this issue through our monitoring system. In SFY 2004, 13 programs were identified through monitoring as out of compliance in this area. All received corrective action plans, and all were closed out within the year, based on surveillance of data through Contract Performance review. Please see Baseline Data for Indicator 9 for a through discussion of corrective action plans issued and subsequent actions.

FFY	Measurable and Rigorous Target
<b>2005</b> (2005-2006)	100% of eligible infants and toddlers with IFSPs will have an evaluation, assessment, and initial IFSP meeting conducted within Part C's 45-day timeline.
<b>2006</b> (2006-2007)	100% of eligible infants and toddlers with IFSPs will have an evaluation, assessment, and initial IFSP meeting conducted within Part C's 45-day timeline.
<b>2007</b> (2007-2008)	100% of eligible infants and toddlers with IFSPs will have an evaluation, assessment, and initial IFSP meeting conducted within Part C's 45-day timeline.
<b>2008</b> (2008-2009)	100% of eligible infants and toddlers with IFSPs will have an evaluation, assessment, and initial IFSP meeting conducted within Part C's 45-day timeline.
<b>2009</b> (2009-2010)	100% of eligible infants and toddlers with IFSPs will have an evaluation, assessment, and initial IFSP meeting conducted within Part C's 45-day timeline.
<b>2010</b> (2010-2011)	100% of eligible infants and toddlers with IFSPs will have an evaluation, assessment, and initial IFSP meeting conducted within Part C's 45-day timeline.

**Improvement Activities/Timelines/Resources:**

The Lead Agency continues to monitor evaluation, assessment and IFSP meeting within 45 days as a contract performance standard for all providers. This became a key area of monitoring in SFY 2004 for the first time. As a result of the Lead Agency's increased focus on this area, the State's compliance rate has increased significantly. This will continue to be a key area of focus in our General Supervision and on-site monitoring protocol, and will also be regularly reviewed through data monitoring.

During the past year, the Lead Agency developed numerous technical assistance tools to assist providers in coming into compliance with the 45 day required timeline. Providers were assisted in developing internal protocols, timelines, tracking and tickler systems that would allow them to better monitor the timeline for IFSP development.

The Annual Program Director training on 12/5/2005 will also focus on timeliness requirements, both in the area of timely provision of services and the 45-day timeline. The Lead Agency will include timeline requirements regarding evaluation, assessment, and initial IFSP meeting within 45 days in mandatory annual program director trainings SFY 2006 and ongoing.



**Part C State Performance Plan (SPP) for 2005-2010****Overview of the State Performance Plan Development:**

Both OSEP and the Lead Agency had previously identified Transition as an area of challenge for Massachusetts, based on inconsistencies in monitoring data from the SFY 2003 APR.

In response, the Lead Agency implemented a variety of training and technical assistance activities, detailed in our November 22, 2004 letter to OSEP, including:

- Updates to the EIIS “Discharge” form, implemented in SFY 2004. Transition information was moved from the IFSP Client Registration Form to the Discharge Form, allowing us to more accurately capture transition information for all children at discharge, including for children discharged because they no longer meet eligibility criteria.
- Updates to the state’s Universal IFSP form, listing the required components of Transition directly on the Transition Page of the form
- Updates to training, including mandatory training delivered to all new EI providers, and training specifically on Transition

In addition, a new State Agency, Department of Early Education and Care (EEC), began July 1, 2005, and now includes Preschool Special Education Services formerly within the state’s Department of Education (DOE). This change in the Massachusetts services landscape is expected to trigger needed updates affecting Transition policies: for example, the interagency agreement on Transition, formerly with DOE, will now be re-written with EEC as a collaborator.

The Part C Lead Agency also initiated a joint application across the three agencies (DPH, EEC, DOE) for a GSEG grant for SFY 2006-2007 to support more comprehensive transition and consistent child outcomes through data systems that communicate across agencies, for example, potentially assigning State-Assigned Student Identification (SASID) numbers to young children at entry into Part C services. If received, the GSEG funding will allow us to build in numerous supports for a more consistent system of transitions.

“Transition” is our second area of Focused Monitoring (with “Service Coordination”). Through the Focused Monitoring process, we hope to identify some of the key factors that are impeding our ability to demonstrate compliant transition.

***(The following items are to be completed for each monitoring priority/indicator.)***

<b>Monitoring Priority: Effective General Supervision Part C / Effective Transition</b>
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**Indicator 8:** Percent of all children exiting Part C who received timely transition planning to support the child’s transition to preschool and other appropriate community services by their third birthday including:

- IFSPs with transition steps and services
- Notification to LEA, if child potentially eligible for Part B: and
- Transition conference, if child potentially eligible for Part B.

(20 USC 1416(a)(3)(B) and 1442)

<b>Measurement:</b>
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- A. Percent = # of children exiting Part C who have an IFSP with transition steps and services divided by # of children exiting Part C times 100.
- B. Percent = # of children exiting Part C and potentially eligible for Part B where notification to the LEA occurred divided by the # of children exiting Part C who were potentially eligible for Part B times 100.
- C. Percent = # of children exiting Part C and potentially eligible for Part B where the transition conference occurred divided by the # of children exiting Part C who were potentially eligible for Part B times 100.

**Overview of Issue/Description of System or Process:**

In September 2005, the Lead Agency distributed a Self-Assessment to all EI providers to gather baseline data on services, protocols, and policies utilized within the system in SFY 2005. The Self-Assessment included a three-part Transition Survey to gather baseline data for the SPP. Each program was provided with the Unique Identification numbers of each child who had been discharged from the program as potentially LEA eligible during the prior year. Programs were asked to answer the following three questions for each child:

- ♦ Did a transition planning conference occur for this child?
- ♦ If Yes, was the LEA invited?
- ♦ If Yes, was the LEA present?

If No, please describe why or why not.

In OSEP's letter of October 21, 2005, responding to Massachusetts' SFY 2004 APR, the state is required to submit updated data regarding Transition Planning Conferences. This data, appearing below under "baseline", was collected in the SFY 2005 self-assessment submitted by programs, and verified through comparison with exiting data from the EIIS and monitoring visits.

OSEP's letter of October 21, 2005, specifically requests information on notification to LEAs of potentially eligible children. The Transition page of the Universal IFSP utilized in Massachusetts includes the following language regarding required Transition activities:

*The process includes activities and tasks performed by the family and EI staff and should include a review of options for families, information for parents regarding the process of transition, support available to parents, **information to be sent to the LEA and/or other community providers**, and the specific plan for how the child will successfully transition to the next setting.*

LEAs are routinely notified of potentially eligible children, but vary widely in their response to this notification and in whether they attend Transition Planning Conferences. Monitoring data from file review demonstrates that documentation of LEA notification has not been consistently present on the Transition page of the IFSP. This is an identified area that will be corrected.

Data collected from this survey provided the Lead Agency with some insight into the needs for training within the system.

**Baseline Data for FFY 2004 (2004-2005):**

- A. 72.3% of ALL children discharged (regardless of age of discharge), based on exiting data from OSEP's Table 3, had a "yes" answer to "Was the individual transition plan fully developed?"**
- B. 61.5% of children discharged from EI and potentially eligible for Part B, had a "yes" answer to "was the LEA invited?" on the Transition Survey on the Annual Report/Self-Assessment.**
- C. 85.2% of children discharged from EI and potentially eligible for Part B had a "yes" answer to "Did a Transition conference occur for this child?"**

**Discussion of Baseline Data:**

Answers to the Transition Survey questions demonstrate a wide range of interpretations among EI providers, which the Lead Agency plans to address at the Directors' Training December 5<sup>th</sup>. Some of the information gathered includes the following:

- ♦ Many EI clinicians believe that a transition plan is not needed for any child who is either younger than 2 ½ or who is not potentially eligible for Part B.
- ♦ Many EI clinicians believe that the Transition Planning Conference is the same as the IEP meeting.
- ♦ Some programs have been specifically told by the LEA in their area that the LEA will not attend transition planning conferences. In these cases, the EI programs have not been holding meetings at all, believing that without the presence of the LEA, transition planning is not possible.
- ♦ The Lead Agency has developed a proposed definition for "Transition Planning Conference", as follows:

Transition Planning Conference: **The required meeting that is held with a child and/or his/her family, and documented on the "Transition Page" of the IFSP, at least 90 days and up to 6 months prior to the child's third birthday. The purpose of the conference is to inform the family about all possible transition options and to prepare the family for the termination of EI services.**

**For children potentially eligible for service through their Local Education Agency (LEA), the LEA must be invited to the conference. The transition planning conference must include a discussion of concrete next steps, and must be documented as a transition planning conference on a contact note.**

**For children discharged prior to their third birthday for any reason, the conference must include sharing information with the family about community options for services for young children.**

<b>FFY</b>	<b>Measurable and Rigorous Target</b>
<b>2005</b> (2005-2006)	<b>100% of children exiting Part C have: Transition plans with steps and services and, if potentially eligible for Part B, have their LEA notified AND have a transition planning conference at least 90 days and up to six months prior to their third birthday.</b>
<b>2006</b> (2006-2007)	<b>100% of children exiting Part C have: Transition plans with steps and services and, if potentially eligible for Part B, have their LEA notified AND have a transition planning conference at least 90 days and up to six months prior to their third birthday.</b>
<b>2007</b> (2007-2008)	<b>100% of children exiting Part C have: Transition plans with steps and services and, if potentially eligible for Part B, have their LEA notified AND have a transition planning conference at least 90 days and up to six months prior to their third birthday.</b>
<b>2008</b> (2008-2009)	<b>100% of children exiting Part C have: Transition plans with steps and services and, if potentially eligible for Part B, have their LEA notified AND have a transition planning conference at least 90 days and up to six months prior to their third birthday.</b>
<b>2009</b> (2009-2010)	<b>100% of children exiting Part C have: Transition plans with steps and services and, if potentially eligible for Part B, have their LEA notified AND have a transition planning conference at least 90 days and up to six months prior to their third birthday.</b>
<b>2010</b> (2010-2011)	<b>100% of children exiting Part C have: Transition plans with steps and services and, if potentially eligible for Part B, have their LEA notified AND have a transition planning conference at least 90 days and up to six months prior to their third birthday.</b>

#### **Improvement Activities/Timelines/Resources:**

As previously mentioned, this is one of the key areas we have selected for Focused Monitoring, the process we will utilize beginning in 2006 to decide which programs receive on-site visits. In Massachusetts, all children discharged from Early Intervention, whether discharged at or prior to their third birthday, whether potentially LEA eligible or not, are required to be informed about concrete steps for transition. Our indicator for Focused Monitoring in this area, therefore, is

“number of children with at least one referral at discharge from Early Intervention”. Referrals may be made by the EI program or the service coordinator or may be initiated by the family.

Five programs will be selected for onsite visits based on this indicator.

In response to OSEP’s request for a plan to correct non-compliance in this area, the following steps have been taken:

The Lead Agency has developed a new Transition Page for the IFSP that covers each of the required areas by incorporating the following :

**Date Invitation sent to LEA** \_\_\_\_\_

**Date of Transition Planning Conference** \_\_\_\_\_ *(known as the 90 day meeting with Local Education Agency (LEA). Please note based on the new federal language this meeting may occur up to 9 months before the child is eligible for preschool.*

**LEA attended transition planning conference** \_\_\_\_\_yes \_\_\_\_\_no

**Anticipated date of Transition:** \_\_\_\_\_

This Transition Page will be “rolled out” to community providers on 12/5/2005, with the following plan:

- The Self-Assessment for SFY 2006 will again include a Transition Survey to be completed by providers, in order for the Lead Agency to collect needed transition data. The data reported by providers will be verified against service delivery data.
- In the SFY 2006 Transition Survey, the Lead Agency will collect data on children discharged between January 2006 and June 2006.
- Providers must begin to utilize the new Transition page within their IFSP’s on January 1, 2006 in order to collect accurate data.
- The Lead Agency will include timelines/procedural requirements regarding transition to all “next step” services in annual mandatory program director trainings, as well as in updated materials. When slippage is identified through data review, programs will receive monitoring and be required to submit and implement corrective action planing.

## Part C State Performance Plan (SPP) for 2005-2010

## Overview of the State Performance Plan Development:

*(The following items are to be completed for each monitoring priority/indicator.)*

<b>Monitoring Priority: Effective General Supervision Part C / General Supervision</b>
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**Indicator 9:** General supervision system (including monitoring, complaints, hearings, etc.) identifies and corrects noncompliance as soon as possible but in no case later than one year from identification.

(20 U.S.C. 1416(a)(3)(B) and 1442)

<b>Measurement:</b>
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- |   |
|---|
| <p>A. Percent of noncompliance related to monitoring priority areas and indicators corrected within one year of identification:</p> <ul style="list-style-type: none"> <li>a. # of findings of noncompliance made related to priority areas.</li> <li>b. # of corrections completed as soon as possible but in no case later than one year from identification.</li> </ul> <p>Percent = b divided by a times 100.</p> <p>For any noncompliance not corrected within one year of identification, describe what actions, including technical assistance and/or enforcement that the State has taken.</p> <p>B. Percent of noncompliance related to areas not included in the above monitoring priority areas and indicators corrected within one year of identification:</p> <ul style="list-style-type: none"> <li>a. # of findings of noncompliance made related to such areas.</li> <li>b. # of corrections completed as soon as possible but in no case later than one year from identification.</li> </ul> <p>Percent = b divided by a times 100.</p> <p>For any noncompliance not corrected within one year of identification, describe what actions, including technical assistance and/or enforcement that the State has taken.</p> <p>C. Percent of noncompliance identified through other mechanisms (complaints, due process hearings, mediations, etc.) corrected within one year of identification:</p> <ul style="list-style-type: none"> <li>a. # of EIS programs in which noncompliance was identified through other mechanisms.</li> <li>b. # of findings of noncompliance made.</li> <li>c. # of corrections completed as soon as possible but in no case later than one year from identification.</li> </ul> <p>Percent = c divided by b times 100.</p> <p>For any noncompliance not corrected within one year of identification, describe what actions, including technical assistance and/or enforcement that the State has taken.</p> |
|---|

**Overview of Issue/Description of System or Process:**

Prior to SFY 2004, the Lead Agency's staff of six Regional Specialists performed a regular annual cycle of program recertification visits to all 63 programs, visiting half of the programs each year and recertifying them all annually, based on each program meeting state and federal criteria for compliance.

With the initiation of our discussions on implementing a more focused approach, we began to provide “Focused Monitoring” recertification visits in SFY 2004, to maximize Lead Agency resources, allow us to transition to a more data-driven approach, and maintain a presence in programs within each region. The more “focused” approach was a less intensive, in depth visit but still included all the basic components of a monitoring visit: data review, file review, on site interviews, family focus groups.

In SFY 2005, a total of 3 full recertification visits, 38 “focused monitoring” visits, and 68 other visits (made for the purposes of technical assistance, training, or to monitor ongoing program compliance in previously identified areas) were completed by Regional Staff. Detailed information on these visits, by region of the state, is below under “Discussion of Baseline Data”.

Within our system, we identify noncompliance by programs as either F (Federal: non-compliant with IDEA regulations, for example, not meeting 45-day timeline or incomplete Transition Plan) or S (State: not meeting State standards, for example, staff health and safety records are incomplete). When program noncompliance exists, it generally exists in both categories for an individual program: however, we write one corrective action plan, citing multiple issues as necessary, per program. Therefore, we have defined our Category F as “A” below: non-compliance related to monitoring priority areas. Our Category S is defined as “B”: non-compliance not related to priority areas. There is significant overlap within these two categories. Finally, “C” consists of non-compliance that we have identified through the parent complaint system or through monitoring of our data system.

#### **Baseline Data for FFY 2004 (2004-2005):**

- A.** Noncompliance related to monitoring priority areas and indicators corrected within one year of identification: **33** instances of non-compliance with priority areas were identified throughout our system in SFY 2005. These resulted in **34** corrective action plans addressing monitoring priority areas, of which **28** have been completed (**82%**).
- B.** Noncompliance not related to the monitoring priority areas and indicators corrected within one year of identification: **30** instances of noncompliance not related to the priority indicators and areas were identified throughout our system in SFY 2005. These resulted in **24** corrective action plans addressing a variety of areas, of which **24** have been completed (**80%**).
- C.** Noncompliance identified through other mechanisms: **4** instances of noncompliance were identified, of which one has been closed out and three are pending. (**25%**).

**NOTE:** While the Lead Agency’s monitoring activities continue to uncover some non-compliance in priority areas, it is not systemic non-compliance as it occurs on only one or two records in individual programs.

#### **Discussion of Baseline Data:**

A breakdown of all monitoring visits provided in Massachusetts in SFY 2005 is provided below. Please note this shows the number of ISSUES identified in each category, where above we have listed the number of PLANS requested for each category:

# SPP Template – Part C (3)

Massachusetts  
State

<b>Region</b>			<b>Southeast</b>	<b>MetroWest</b>	<b>Boston</b>	<b>Northeast</b>	<b>Central</b>	<b>West</b>	<b>Total</b>	<b>Specialty</b>
<b>No. of programs</b>			<b>11</b>	<b>7</b>	<b>9</b>	<b>14</b>	<b>10</b>	<b>12</b>	<b>63</b>	
<b>Site Visits</b>	<b>A</b>	Recert.	0	0	0	1	2	0	3	0
	<b>B</b>	Focused Monitoring	7	3	6	13	3	6	38	0
	<b>C</b>	Other	31	1	4	17	6	9	68	9
	<b>D</b>	<b>Total site visits</b>	<b>38</b>	<b>4</b>	<b>10</b>	<b>31</b>	<b>11</b>	<b>15</b>	<b>109</b>	<b>9</b>
	<b>E</b>	Parent recert team member present	5	2	3	10	5	6	31	0
<b>Results of Completed Reports</b>	<b>F</b>	Corrective action plans requested	7	2	6	14	5	6	42	0
	<b>1</b>	State - compliance: ## of issues	10	0	8	6	4	6	34	0
	<b>2</b>	Federal - compliance: ## of issues	7	2	7	5	6	6	33	0
	*	IFSP 45 day	4	2	6	3	4	4	(23)	
	*	Incomplete Transition plans	6	1	4	5	5		(22)	
	*	90 day mtng				1		4	(5)	
	*	6 mo IFSP reviews	3		3	2	1		(9)	
	*	justification segregated	1		2	1			(4)	
	*	incomplete IFSPs	1		1		4	1	(7)	
	*	notification IFSP meeting			1		1	3	(5)	
		IFSP > 1 year						1	(1)	
		Consent Forms	4		3		1		(8)	



## SPP Template – Part C (3)

Massachusetts  
State

Non-compliance identified through monitoring of data and through the complaint system is as follows:

SFY 2005 Corrective Action Plans As A Result of General Supervision Data Monitoring						
Program	General Supervision Data Source	Plan Requested	Compliance Issues Identified (F) – Federal (S) – State	Plan Rec'd	Actions Steps & Strategies	Date Plan Closed
KDC Plymouth	<ul style="list-style-type: none"> <li>- EIS data – 45 day timeline</li> <li>- parent calls</li> <li>- program self report</li> </ul>	March 2005	<ul style="list-style-type: none"> <li>- Initial IFSP meetings within 45 days of referral (F)</li> </ul>	April 2005	<ul style="list-style-type: none"> <li>- Developed internal tracking/ monitoring process for 45 day timeline</li> <li>- Staff training on timeline and need for appropriate documentation of reasons beyond 45 days.</li> <li>- Extensive recruitment of additional staff</li> <li>- Streamlined Intake process</li> <li>- Met with lead agency staff to discuss efforts and ensure ongoing compliance</li> </ul>	Closed June 30, 2005 – EIP remains on monthly monitor through December 2005 by lead agency. DPH also monitors EIS data to ensure compliance with 45 day timeline.

FFY	Measurable and Rigorous Target
<b>2005</b> (2005-2006)	<b>100% of noncompliance related to monitoring priority areas, not related to monitoring priority areas, and identified through other methods, is corrected within one year.</b>
<b>2006</b> (2006-2007)	<b>100% of noncompliance related to monitoring priority areas, not related to monitoring priority areas, and identified through other methods, is corrected within one year.</b>
<b>2007</b> (2007-2008)	<b>100% of noncompliance related to monitoring priority areas, not related to monitoring priority areas, and identified through other methods, is corrected within one year.</b>
<b>2008</b> (2008-2009)	<b>100% of noncompliance related to monitoring priority areas, not related to monitoring priority areas, and identified through other methods, is corrected within one year.</b>
<b>2009</b> (2009-2010)	<b>100% of noncompliance related to monitoring priority areas, not related to monitoring priority areas, and identified through other methods, is corrected within one year.</b>
<b>2010</b> (2010-2011)	<b>100% of noncompliance related to monitoring priority areas, not related to monitoring priority areas, and identified through other methods, is corrected within one year.</b>

**Improvement Activities/Timelines/Resources:**

With the implementation of Focused Monitoring for on site selection, we intend to continue and enhance the following activities:

- Use of numerous data sources (all previously referred to) to monitor programs and ensure compliance.
- Use of consistent follow-up tools (on site monitoring, data review, parent complaint monitoring) to ensure that noncompliance is corrected and stays corrected.

- Updates to Early Intervention Information System as needed to collect data that allows us to monitor effectively.
- As appropriate and timely, engage the Data Task Force Advisory Committee of the ICC to make recommendations regarding use and collection of data.
- Implement requirements for new Enterprise System Management (ESM) data basics and update annually (see Indicator # 14).

**Part C State Performance Plan (SPP) for 2005-2010****Overview of the State Performance Plan Development:**

This indicator, *signed written complaints with reports issued were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint*, occasioned an interesting discussion at the public input session in November. The Lead Agency was asked, “Is your goal to increase the number of parent complaints?” Our goal is to ensure that all families have received and have full access to (in the sense of both understanding and being comfortable with using) their due process rights.

Given the size of our system (cumulative number of children served approximately 30,000 per year), we have a minimal number of formal administrative/due process complaints registered. In both SFY 2003 and SFY 2004, we had three parent complaints, and in SFY 2005 we had five. All were investigated and had reports issued within the 60-day timeline.

The Lead Agency does address multiple parent questions/ requests for information on numerous fronts. These may be issues that could potentially become complaints if left un-addressed. Parents are always informed of their due process rights and options when they contact the Lead Agency. A complaint that is registered with the Coordinator of Procedural Safeguards typically contains multiple issues, but is addressed and registered as one complaint per family.

*(The following items are to be completed for each monitoring priority/indicator.)*

<b>Monitoring Priority: Effective General Supervision Part C / General Supervision</b>
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**Indicator 10:** Percent of signed written complaints with reports issued that were resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.

(20 U.S.C. 1416(a)(3)(B) and 1442)

<b>Measurement:</b>
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Percent = (1.1(b) + 1.1(c)) divided by (1.1) times 100.
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**Overview of Issue/Description of System or Process:**

The Lead Agency has been in the process of updating materials related to the procedural safeguards system, including:

- Training offered to EI programs, staff, and families, and the state’s Parent Training Information Center throughout SFY 2004 and SFY 2005.
- Consent forms that reflect all of families’ rights under the IDEA.

Calls may come in to the Lead Agency from family members with issues ranging from simple questions about their rights or program process to more complex questions that may eventually result in filing written complaints. All Lead Agency staff inform parents of their due process rights and have developed a system for ensuring that families' questions are addressed in a timely manner by the Lead Agency staff person most appropriate to address the particular complaint.

**Baseline Data for FFY 2004 (2004-2005):**

Five signed written complaints were received by the Lead Agency, investigated within the timelines, and had reports issued **(100%)**.

**Discussion of Baseline Data:**

FFY	Measurable and Rigorous Target
<b>2005</b> (2005-2006)	<b>100% of signed written complaints with reports issued are resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.</b>
<b>2006</b> (2006-2007)	<b>100% of signed written complaints with reports issued are resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.</b>
<b>2007</b> (2007-2008)	<b>100% of signed written complaints with reports issued are resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.</b>
<b>2008</b> (2008-2009)	<b>100% of signed written complaints with reports issued are resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.</b>
<b>2009</b> (2009-2010)	<b>100% of signed written complaints with reports issued are resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.</b>
<b>2010</b> (2010-2011)	<b>100% of signed written complaints with reports issued are resolved within 60-day timeline or a timeline extended for exceptional circumstances with respect to a particular complaint.</b>

**Improvement Activities/Timelines/Resources:**

The Lead Agency will continue to make information available regarding procedural safeguards within the system. Goals for the upcoming year include updating Family Rights information and having it translated into a variety of languages. In addition, the Coordinator of Procedural

## **SPP Template – Part C (3)**

Massachusetts  
State

Safeguards has developed universal consent forms to be utilized by all programs, which will be rolled out at the 12/5/2005 training for Program Directors.

## Part C State Performance Plan (SPP) for 2005-2010

## Overview of the State Performance Plan Development:

*(The following items are to be completed for each monitoring priority/indicator.)*

<b>Monitoring Priority: Effective General Supervision Part C / General Supervision</b>
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**Indicator 11:** Percent of fully adjudicated due process hearing requests that were fully adjudicated within the applicable timeline.

(20 U.S.C. 1416(a)(3)(B) and 1442)

<b>Measurement:</b>
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Percent = (3.2(a) + 3.2(b)) divided by (3.2) times 100.
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**Overview of Issue/Description of System or Process:**

The Lead Agency continues to retain under contract an independent hearing officer (formerly with the Bureau of Special Education Appeals) to preside over due process hearings. Plans were initiated in SFY 2004 to broaden this resource by establishing a contract with a hearing officer in the Western part of the state. However, as that candidate is currently unavailable, those plans have been temporarily placed on hiatus.

Parents continua to be informed of their option to access formal due process hearings to resolve disputes involving any aspect of their child's IFSP. A description of the process and timelines is provided, and parents are also given a resource list of free and low-cost legal and advocacy supports.

**Baseline Data for FFY 2004 (2004-2005):**

No due process hearing requests were received in SFY 2005.

**Discussion of Baseline Data:**

FFY	Measurable and Rigorous Target
<b>2005</b> (2005-2006)	<b>100% of due process hearing requests are fully adjudicated within the applicable timeline.</b>
<b>2006</b> (2006-2007)	<b>100% of due process hearing requests are fully adjudicated within the applicable timeline.</b>

<b>2007</b> (2007-2008)	<b>100% of due process hearing requests are fully adjudicated within the applicable timeline.</b>
<b>2008</b> (2008-2009)	<b>100% of due process hearing requests are fully adjudicated within the applicable timeline.</b>
<b>2009</b> (2009-2010)	<b>100% of due process hearing requests are fully adjudicated within the applicable timeline.</b>
<b>2010</b> (2010-2011)	<b>100% of due process hearing requests are fully adjudicated within the applicable timeline.</b>

**Improvement Activities/Timelines/Resources:**

SFY 2006: Family Rights information distributed by the Lead Agency and by all EI programs will be updated and translated and made widely available. It will include training information on family rights and procedural safeguards.

SFY 2007: Annual Program directors' training will include distribution of updated information on procedural safeguards and updated Materials Request Form for programs. Lead Agency monitors programs' ability to meet required timeframes and addresses any slippage through corrective action.

These activities will be continued through SFY 2010.



**Part C State Performance Plan (SPP) for 2005-2010**

**Overview of the State Performance Plan Development:**

**Please Note: Not Applicable as we have developed Part C due process procedures.**

*(The following items are to be completed for each monitoring priority/indicator.)*

**Monitoring Priority: Effective General Supervision Part C / General Supervision**

**Indicator 12:** Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements (applicable if Part B due process procedures are adopted).

(20 U.S.C. 1416(a)(3)(B) and 1442)

**Measurement:**

Percent = 3.1(a) divided by (3.1) times 100.

**Overview of Issue/Description of System or Process:**

**Baseline Data for FFY 2004 (2004-2005):**

**Discussion of Baseline Data:**

**Improvement Activities/Timelines/Resources:**

**Part C State Performance Plan (SPP) for 2005-2010****Overview of the State Performance Plan Development:**

**Per guidance from OSEP (FAQ below), we are not answering this question as we have not reached the threshold of 10 mediation requests. In fact, we have received no mediation requests in SFY 2005.**

**Question: If a State had no mediation requests in 2004-2005, how does the State set targets?**

**Answer: The number of mediation sessions that are resolved through written settlement agreements is dependent on many factors. However, a State should not set targets for Indicator 13 unless its baseline data reflect that it has received a minimum threshold of 10 mediation requests.**

*(The following items are to be completed for each monitoring priority/indicator.)*

<b>Monitoring Priority: Effective General Supervision Part C / General Supervision</b>
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**Indicator 13:** Percent of mediations held that resulted in mediation agreements.

(20 U.S.C. 1416(a)(3)(B) and 1442)

<b>Measurement:</b>
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Percent = (2.1(a)(i) + 2.1(b)(i)) divided by (2.1) times 100.
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**Overview of Issue/Description of System or Process:**

The Lead Agency continues to utilize mediators, when needed, from the Bureau of Special Education Appeals at the Massachusetts Department of Education. Families are informed of their option to access mediation services to resolve disputes.

**Baseline Data for FFY 2004 (2004-2005):**

**Discussion of Baseline Data:**

**Part C State Performance Plan (SPP) for 2005-2010****Overview of the State Performance Plan Development:**

In responding to this indicator, *state reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate*, the Lead Agency reviewed prior submissions, notes and OSEP correspondence, and determined that the state's reports are consistently submitted by required deadlines, meeting the criteria for "timely". We did note that our reporting on personnel had not always been timely, but are also aware that that report will not be required moving forward.

In terms of accuracy, the Lead Agency reviewed past correspondence and notes from our data verification visit and has determined that safeguards are in place to ensure the accuracy of data submitted.

*(The following items are to be completed for each monitoring priority/indicator.)*

<b>Monitoring Priority: Effective General Supervision Part C / General Supervision</b>
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**Indicator 14:** State reported data (618 and State Performance Plan and Annual Performance Report) are timely and accurate.

(20 U.S.C. 1416(a)(3)(B) and 1442)

<b>Measurement:</b>
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State reported data, including 618 data, State performance plan, and annual performance reports, are:
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- |   |
|---|
| <ul style="list-style-type: none"> <li>a. Submitted on or before due dates (February 1 for child count, including race and ethnicity, settings and November 1 for exiting, personnel, dispute resolution); and</li> <li>b. Accurate (describe mechanisms for ensuring accuracy).</li> </ul> |
|---|

**Overview of Issue/Description of System or Process:**

The Data Manager, the Assistant Director for Policy, Planning, and Training, and the Coordinator of EI Field Services work closely together to monitor data, design responsive data and reporting systems, and collate information used to report to OSEP and to WESTAT for the 618 data.

**Baseline Data for FFY 2004 (2004-2005):**

100% of required reports were submitted on time and were accurate.

**Discussion of Baseline Data:**

Despite limited resources, the Lead Agency works to ensure the accuracy and consistency of data. Our verification process consists of matching various data sources against each other to check for accuracy in numerous areas. For example, one piece of our Data Verification Plan

to monitor the accuracy of the annual self-assessment is to cross-reference program-reported eligibility based on file review with eligibility entered in the EIIS. We also check service delivery records against IFSP data entered in EIIS to determine that children are receiving services listed on their IFSPs.

<b>FFY</b>	<b>Measurable and Rigorous Target</b>
<b>2005</b> (2005-2006)	<b>100% of state data reports are timely and accurate.</b>
<b>2006</b> (2006-2007)	<b>100% of state data reports are timely and accurate</b>
<b>2007</b> (2007-2008)	<b>100% of state data reports are timely and accurate</b>
<b>2008</b> (2008-2009)	<b>100% of state data reports are timely and accurate</b>
<b>2009</b> (2009-2010)	<b>100% of state data reports are timely and accurate</b>
<b>2010</b> (2010-2011)	<b>100% of state data reports are timely and accurate</b>

**Improvement Activities/Timelines/Resources:**

Massachusetts continues to move towards a complex human services management system for state agencies that will link service delivery/billing data with eligibility data for numerous programs within the state health and human services system. This new entity, to be called Enterprise Invoice Management/Enterprise Service Management (EIM/ESM), will be piloted at three entities of the Department of Public Health, one of which is the Early Intervention system. It is expected that the pilot may begin by July 2006. EIM/ESM will effectively replace the early Intervention Information System and will significantly extend the data collection, verification, accuracy, and reporting capabilities of the system.

SFY 2006: Continuous improvement of EIM/ESM will occur through updates on ongoing version upgrades. Additional queries will be added as necessary to remain responsive to OSEP and other stakeholder data requests/requirements.